

Exhibit I

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

GREGORY GOODWIN

Plaintiff,

$$\mathbf{V}_0$$

ACCURIDE ERIE, L.P.

Defendant.

Civil Action No. 05-161 Erie

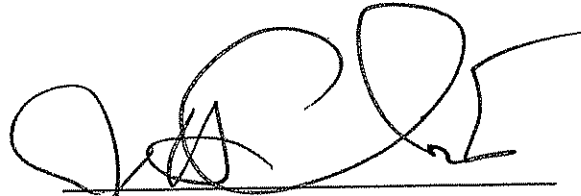
Judge Maurice B. Cohill, Jr.

**PLAINTIFF'S ANSWERS AND RESPONSES TO DEFENDANT'S
FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF
DOCUMENTS DIRECTED TO PLAINTIFF**

AND NOW COMES Plaintiff, Gregory Goodwin, by and through his counsel, Joseph H. Chivers, Esquire, and hereby answers and otherwise responds to Defendant's First Sets of Interrogatories and Requests for Production of Documents to Plaintiff.

Pursuant to the discovery provisions of the Federal Rules of Civil Procedure, and the rules, definitions and instructions proscribed by Defendant in its discovery requests, Plaintiff answers and responds as follows, with numbered Answers/Responses corresponding to Defendant's numbered requests:

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'J. Chivers', written over a horizontal line.

Joseph H. Chivers, Esquire
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312 Boulevard of the Allies
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(412) 281-1110
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Counsel for Plaintiff
Gregory Goodwin

DATED: January 13, 2006

10. Identify the facts supporting the allegations of sex discrimination set forth in the Complaint

ANSWER: Ms. Gore refused to do a job and created a work stoppage slow down. She received only 1 day off to be determined 3 wks. later as the day she walked out.

11. Identify the facts supporting the allegations of race discrimination set forth in the Complaint.

ANSWER: Ms. Gore - same as above - Dan Kelley suspended. Greg Goodwin - terminated.

Aubrey Favors - aggressor in locker room against John Plyler. John Plyler received a written warning and was in fear of termination. Mr. Favors the aggressor received nothing and was later promoted to management.

16. If Plaintiff has applied for any pension, annuity, social security or disability benefits since July 23, 2004, state the name and address of each entity to which he applied, the date of his application, and the date he received his first check.

ANSWER: none

17. Identify each individual employed by Defendant who you contend was treated more favorably than you because of that person's sex.

ANSWER: Sabrina Gore
ABROY FAVORS

18. Identify each individual employed by Defendant who you contend was treated more favorably than you because of that person's race.

ANSWER: Sabrina Gore
Aubrey Favors

19. Did the Plaintiff ever discuss his termination with any agent or employee of the Defendant? If so, identify each agent or employee of the Defendant and relate in detail each discussion.

ANSWER: NO